## Constantino, Mike

From: Montague, Valerie Breslin [vbmontague@uhlaw.com]

Sent: Wednesday, June 27, 2012 2:40 PM

To: Constantino, Mike

**Cc:** Vinson, Sam; Miller, Claudette P.; Garvey, Michelle M.

**Subject:** RE: genesis health system

Attachments: Genesis Medical Park Moline Updated CON Submission.pdf

Mike,

Following our conversation this morning, attached please find Genesis Health System's response to the issues raised in your June 18, 2012 email.

Please let me know if we can provide anything further in hopes of having this application deemed complete tomorrow.

Thanks,

Valerie

From: Constantino, Mike [mailto:Mike.Constantino@Illinois.gov]

Sent: Monday, June 18, 2012 9:30 AM

**To:** Montague, Valerie Breslin **Subject:** genesis health system

Hi Valerie:

I am reviewing your application for permit for the medical office building with clinical services.

Regarding medical office buildings. Our current interpretation is that any building by or behalf of a health care facility that exceeds the threshold that has clinical space would need to be reviewed by the Board. We consider the convenient care clinic, x-ray, radiology, MRI etc. and pharmacy as clinical space that would need to be reviewed by us. Therefore we do not believe that this is a total non-clinical project.

What we need is the total cost of the medical office building as one project cost and sources of funds statement broken out between clinical and nonclinical and the cost space chart in similar fashion.

We also do not accept letters of intent as sufficient documentation of an agreement. We will need the complete agreements signed and dated with the appropriate language.

Regarding the clinical services they would need to be reviewed under 77 IAC 1110.3330. The rental of physician offices would not be reviewable by us as it was in the past.

Also we are going to need an address. If the postal office has not assigned a street address, please state that.

Finally while I like seeing my name in print, I cannot remember telling anyone at Ungaretti and Harris that we do not need the source of funds for a project. A developer is not required to be a coapplicant, but we do need the source of funds for all projects.

I have attached our interpretation of medical office building projects provided at the March 2009 State Board Meeting.

Mike Constantino Illinois Department of Public Health 525 West Jefferson Springfield, Illinois 62761 Fax:(217) 785-4111 Phone:(217) 785-1557

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